

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA, ex rel.)
LOUIS LONGO,)

Plaintiff-Relator)

v.)

Case No. 2:17-cv-01654-MJH

WHEELING HOSPITAL, INC.,)
R&V ASSOCIATES, LTD., and)
RONALD L. VIOLI)

Defendants.)

DECLARATION OF ASHLEY LUDWICK

I, Ashley Ludwick, hereby declare as follows:

1. I am an adult over the age of eighteen (18) and a resident of the State of Ohio.
2. The information contained in this Declaration is based on my personal knowledge.

If called to testify, I would state as follows:

3. I have been the practice manager for Dr. Adam Tune since he started working at Wheeling Hospital ("Hospital") in 2013.

4. In my position as practice manager, I have had the opportunity to observe Dr. Tune's patient schedules and weekly time cards.

5. All of Dr. Tune's work for Wheeling Hospital is conducted at the Hospital's campus in Wheeling, West Virginia.

6. Dr. Tune's paper files for his active patients are kept in his office at the Hospital in Wheeling, West Virginia.

7. Dr. Tune's paper files for his non-active patients who have not been seen in the past

three years are stored at the Hospital's off-site storage facility in downtown Wheeling.

8. I served as the practice manager for Dr. David H. Millett who retired from the Hospital approximately three years ago.

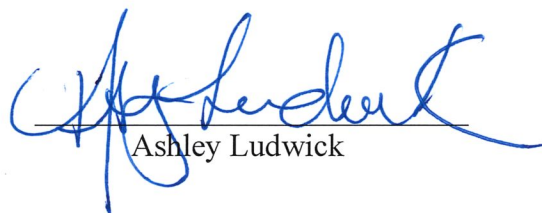
9. Dr. Millett was a non-invasive cardiologist who worked at the Hospital's campus in Wheeling, West Virginia.

10. When Dr. Millett worked at the Hospital, his files were maintained in his office. They now are stored at the Hospital's off-site storage facility in Wheeling.

11. To the best of my knowledge, Dr. Millett still resides in Wheeling, West Virginia.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 10, 2019
in Wheeling, West Virginia



Ashley Ludwick